

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WOODSTOCK VENTURES LC, and  
THE WOODSTOCK CANNABIS  
COMPANY, LLC,

*Plaintiffs/Counterclaim Defendants,*

v.

WOODSTOCK ROOTS, LLC;  
WOODSTOCK PRODUCTS COMPANY  
INTERNATIONAL, LLC d/b/a  
WOODSTOCK AMERICAN PRODUCTS;  
WOODSTOCK CANNABIS COMPANY,  
LLC; AXCENTRIA PHARMACEUTICALS  
LLC; CHET-5 BROADCASTING, LP; and  
GARY CHETKOF,

*Defendants/Counterclaim Plaintiffs.*

Case No. 18-cv-1840 (PGG)

**JOINT STIPULATION TO MODIFY DISMISSAL ORDER**

Pursuant to Fed. R. Civ. P. 6(b) and Rule 1.D of Your Honor's Individual Rules of Practice, the Parties respectfully request the Court to modify the Dismissal Order (Dkt. No. 143) so that the Parties may finalize their settlement.

The Dismissal Order dismissed this action without prejudice, and required either Party to reinstitute this action within ninety days, i.e., by September 15, 2021, or the action would be dismissed with prejudice. Following the Dismissal Order, the Parties have continued to engage in productive settlement discussions. The settlement of this action is part of a larger negotiation that involves issues of, inter alia, not-for-profit corporate law, tax law and employment law.

In order to facilitate a final resolution and avoid the waste of judicial resources, the Parties respectfully request the Court to extend the time period to reinstitute this action by

another ninety days, i.e., to December 14, 2021. Specifically, the Parties respectfully request the Court to enter the following order:

- If the settlement is not consummated by December 14, 2021, either party may apply by letter on or before December 14, 2021 for restoration of the action to the calendar of the undersigned, in which event the action will be restored. If no party has requested the restoration of this action on or before December 14, 2021, the action will be dismissed with prejudice but without costs at that time.

Dated: September 10, 2021

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*Counsel for Defendants*

IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2021

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Paul G. Gardephe  
United States District Judge